UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

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EUCLIDES SOTO, LOUIS A. MARTINEZ,) NO.	04-10892-JLT
JOSE RAMIREZ, CLEMENTE HERNANDEZ,)	
CESAR PIZARO, ELISON PENA,)	
JUAN COLON, JOSE ORTIZ,)	
RAFAEL TORRES, ANGEL BAEZ,)	
ANTONIO MARTINEZ, WILFREDO ORTIZ,)	
EULOGIO ORTIZ, MIRRAIN MIRANDA,)	
RAFAEL MORENO, NELSON ACEVEDO,)	
and RAMON RODRIGUEZ,)	
)	
Plaintiffs,)	
)	
V.)	
)	
UNITED STEELWORKERS OF AMERICA,)	
ITS LOCAL 421-U, ET AL.)	
)	
DEFENDANTS)	
)	

PLAINTIFFS' WITNESS LIST

The plaintiffs disclosed on February 7, 2005 the following witnesses who will be used at trial and the names and addresses are provided for the jury:

- 1. Lowell Alexander, Keeper of Records of Milford, MA;
- 2. Kenneth Doucette of Malden, MA;
- 3. Nelson Acevedo of Dorchester, MA;
- 4. Angel Baez of Dorchester, MA;
- 5. Miriam Caminero, Roslindale, MA;
- 6. Clemente Hernandez of Dorchester, MA;
- 7. Antonio Martinez of Jamaica Plain, MA;
- 8. Luis A. Martinez of Roslindale, MA;
- 9. Jose E. Ortiz of Dorchester, MA;
- 10. Eulogio Ortiz of Dorchester, MA;

- 11. Juan R. Colon Ortiz of Boston, MA;
- 12. Wilfredo C. Ortiz of Dorchester, MA;
- 13. Elison Pena of Dorchester, MA;
- 14. Cesar Narciso Pizarro of Dorchester, MA;
- 15. Jose D. Ramirez Dorchester, MA;
- 16. Ramon Rodriguez of Florida;
- 17. Euclides Soto of Brockton, MA;
- 18. Rafael Torres of Dorchester, MA; and

It is anticipated that they will also be witnesses at trial.

Respectfully Submitted,

Date: December 7, 2005 /s/ Robert O. Berger

Robert O. Berger (BBO #: 038900) 11 Beacon Street, Suite 1210 Boston, MA 02108 Tel (617) 423-7575 Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, Robert O. Berger, hereby certify that I have served a true and exact copy of the above document by electronic transfer or first class mail, postage prepaid on the following named persons:

Harold Lichten, Esq. Alfred Gordon, Esq. Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, PC 18 Tremont Street, Suite 500 Boston, MA 02108 (Electronic Transfer)

Franklin H. Levy, Esq. **Duane Morris LLP** 470 Atlantic Avenue Boston, MA 02210 (Electronic Transfer)

Theresa Merrill Stones, Esq. United Steelworkers of America Five Gateway Center Pittsburgh, PA 15222 (First Class Mail)

John Lee Diaz, Esq. Law Offices of John Lee Diaz 801A Tremont Street Boston, MA 02118 (First Class Mail)

Date: December 7, 2005 /s/ Robert O. Berger

Robert O. Berger (BBO #: 038900)